# Exhibit L

# UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION

This Document Relates to: Civil File No. 18-296 (MJD/KMM) MDL No. 17-2795 (MJD/KMM)

AMENDED NOTICE OF 30(B)(6) DEPOSITION OF LEAD PLAINTIFF THE STATE OF OREGON

#### TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, counsel for Defendants in the above-captioned action will take the deposition upon oral examination of Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employees Retirement Board, on behalf of the Oregon Public Employees Retirement Fund, at the offices of Stoll Berne, 209 SW Oak Street, Suite 500, Portland, OR 97204, on March 5, 2020, beginning at 9:30 a.m., or on such other date and at such other time as may be agreed upon by the parties.

The deposition will be taken under oath before a certified shorthand reporter or other officer authorized to administer oaths. The deposition will be recorded by stenographic means, on videotape, and by instant visual display of testimony using LiveNote or similar software. The deposition shall be used for discovery purposes and may be used as evidence in this action, including at trial.

Pursuant to Rule 30(b)(6), Lead Plaintiff the State of Oregon shall designate one or more knowledgeable officers, directors, managing agents, or other persons who consent to testify on its behalf concerning the subjects set forth in Exhibit A.

Date: February 25, 2020 Respectfully submitted,

# /s/ Ryan Blair

Patrick E. Gibbs, CA Bar No. 183174 COOLEY LLP 3175 Hanover Street Palo Alto, CA 94304 Telephone: (650) 843-5535

Facsimile: (650) 618-0387 pgibbs@cooley.com

Ryan Blair, CA Bar No. 246724 COOLEY LLP 4401 Eastgate Mall San Diego, CA 92121 Phone: (858) 550-6047

Fax: (858) 550-6420 rblair@cooley.com

Sarah M. Lightdale, NYS Bar No. 4395661 COOLEY LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 479-6374

Facsimile: (212) 479-6275 slightdale@cooley.com

Attorneys for Defendants

# **EXHIBIT A TO NOTICE OF 30(B)(6) DEPOSITION**

# I. **DEFINITIONS**

- "Action" refers to the above-captioned action currently pending in the
   United States District Court for the District of Minnesota, MDL No. 17-2795 (MJD/KMM),
   Civil Action No. 18-296 (MJD/KMM).
- 2. "CenturyLink" means CenturyLink, Inc., a publicly traded corporation headquartered in Monroe, Louisiana.
  - 3. "Class Period" means the time period March 1, 2013 to July 12, 2017, inclusive.
- 4. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise) in any form or format.
- 5. "Complaint" means the Consolidated Securities Class Action Complaint filed on June 25, 2018 in this Action (Docket No. 143).
- 6. "Concerning" means relating to, referring to, describing, evidencing, or constituting.
  - 7. "Defendants" means CenturyLink, Inc. together with the Executive Defendants.
- 8. "Document" is defined to be synonymous in meaning and equal in scope to the usage of the term "documents or electronically stored information" in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term. "Documents" may include Communications.
- 9. "Executive Defendants" means Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, collectively.
- 10. "Motion for Class Certification" means Plaintiffs' Motion for Class Certification,
  Appointment of Class Representatives and Appointment of Lead Counsel filed on January 21,
  2020 in this Action (Docket No. 188).

- 11. "Relevant Period" means the beginning of the Class Period through October 10, 2017.
- 12. "State of Oregon" means Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employees Retirement Board, on behalf of the Oregon Public Employees Retirement Fund, and the officers, directors, employees, partners, corporate parents, subsidiaries, affiliates, trustees, predecessors or successors in interest, representatives, agents, advisors, counsel, or any other persons acting on behalf of or under the direction or control of the State of Oregon.

# II. TOPICS OF EXAMINATION

#### TOPIC 1:

The structure, organization, and responsibilities of the Oregon State Treasury, the Oregon Investment Council, and the Oregon Public Employees Retirement Board.

# **TOPIC 2:**

Policies, procedures, and guidelines that governed investments by or on behalf of the State of Oregon during the Relevant Period.

#### TOPIC 3:

Transactions by the State of Oregon, including any of its divisions and affiliated funds, in CenturyLink securities during the Relevant Period.

# **TOPIC 4:**

Gains or losses on the State of Oregon's transactions in or holdings of CenturyLink securities during the Relevant Period.

#### TOPIC 5:

The State of Oregon's knowledge of CenturyLink's sales and billing practices and customer complaints about CenturyLink's sales and billing practices prior to June 16, 2017.

# **TOPIC 6:**

The State of Oregon's reliance on the misrepresentations and omissions alleged in the Complaint.

# **TOPIC 7:**

Statements in the declarations and certifications made by or on behalf of the State of Oregon in connection with this Action, including the "Certification Pursuant to the Federal Securities Laws" executed by Brian de Haan on behalf of the Oregon Public Employees Retirement Fund on June 22, 2018 and attached to the Complaint, and the January 21, 2020 Declaration of Brian de Haan annexed to Plaintiffs' Motion for Class Certification.

# **TOPIC 8:**

The State of Oregon's retention of, supervision of, and relationship with its counsel in this Action, including Bernstein Litowitz Berger & Grossman LLP and Stoll Berne LLP.

# TOPIC 9:

The basis for the claims and allegations made by the State of Oregon against CenturyLink and the Executive Defendants in the Complaint.

# **TOPIC 10:**

The State of Oregon's participation in any class or collective action as a class representative, lead plaintiff, and/or movant to be appointed lead plaintiff.